

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORTH WORTH DIVISION**

**IN RE 2014 RADIOSHACK ERISA
LITIGATION**

MASTER FILE NO. 4:14-cv-00959-O

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**PLAINTIFFS' MOTION FOR ATTORNEYS' FEES, REIMBURSEMENT OF
EXPENSES, AND CASE CONTRIBUTION AWARDS TO NAMED PLAINTIFFS**

Named Plaintiffs Jeffrey Snyder, Manoj P. Singh, and William A. Gerhart (“Plaintiffs”), on behalf of the Settlement Class of participants in the RadioShack 401(k) Plan and the RadioShack Puerto Rico 1165(e) Plan (the “Plans”), hereby respectfully move this Court, pursuant to FED. R. CIV. P. 23, for an Order:

1. Awarding attorneys’ fees in the amount of \$270,000, which represents 30% of the Settlement Amount;
2. Reimbursement of out-of-pocket expenses of \$40,616.03;
3. Approval of Named Plaintiffs’ Case Contribution Awards of \$5,000 to each of the three Plaintiffs in recognition of their valuable service to the Settlement Class; and
4. For such other and further relief as the Court may deem just and proper.

The grounds for this Motion are set forth in the following papers filed contemporaneously herewith:

A. Memorandum of Law in Support of Plaintiffs’ Motion for an Award of Attorneys’ Fees, Reimbursement of Expenses, and Case Contribution Awards to the Named Plaintiffs; and

B. Declaration of Mark K. Gyandoh in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement, Certification of Settlement Class, and Approval of the Plan of Allocation and Motion For an Award of Attorneys’ Fees, Reimbursement of Expenses and Case Contribution Awards to the Named Plaintiffs, and all exhibits thereto.

Dated: June 10, 2016

Respectfully submitted,

/s/ Mark K. Gyandoh

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CERTIFICATE OF SERVICE

I hereby certify that on June 10, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to registered CM/ECF participants.

/s/ Mark K. Gyandoh

Mark K. Gyandoh